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*ADMITTED IN SOUTH CAROLINA AND DISTRICT OF COLUMBIA

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†Retired

May 12, 2022

VIA SCPSC E-FILING DMS

Jocelyn G. Boyd, Esq.
Chief Clerk & Administrator
Public Service Commission of South Carolina
101 Executive Center Drive
Columbia, SC 29210

Re: Public Service Commission of South Carolina – Administrative and Procedural Matters
Docket No. 2005-83-A

Dear Ms. Boyd:

On behalf of CMC Steel South Carolina (“CMC”), this letter responds to the Public Service Commission of South Carolina’s (“Commission”) Revised Notice of Forum (“Notice”) issued May 5, 2022. The Notice announced that the Commission Staff will hold a Forum Regarding Procedural Schedules in Annual Fuel Proceedings (S.C. Code Ann. Section 58-27-865) and Purchased Gas Adjustment Proceedings on May 18, 2022. The Notice further invited interested persons to notify the Commission of their desire to participate in the forum and to file written comments no later than May 12, 2022. CMC does not intend to attend the forum but, pursuant to the Notice, CMC takes this opportunity to comment on the intervention deadline in annual fuel proceedings.

CMC owns and operates a steel manufacturing facility in Cayce, South Carolina. This facility utilizes an electric arc furnace (“EAF”) to melt and recycle steel. This process requires CMC to purchase very large quantities of electricity from Dominion Energy South Carolina, Inc. (“Dominion”) at a cost of millions of dollars per year. Because the cost of electricity is one of the major costs of steelmaking utilizing an EAF, the cost of electricity directly affects CMC’s ability to produce steel at a competitive price. CMC is one of the largest retail customers of Dominion, and CMC regularly participates in Dominion’s annual fuel proceedings.

CMC requests that in every annual fuel proceeding, the Commission set an intervention deadline that is subsequent to the date on which the utility is required to file its direct testimony. Requiring parties to intervene before they know the issues the utility will raise in their direct testimony places intervenors at a disadvantage. Potential intervenors should have an opportunity to review the

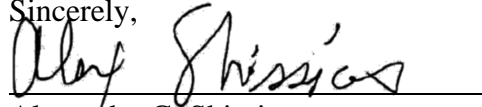
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utility's case before deciding to intervene. As an example, in Dominion's most recent annual fuel proceeding (Docket No. 2022-2-E), the "Notice of Filing and Public Hearing" was issued October 13, 2021; the notice set an intervention deadline of December 3, 2021, but Dominion was not required to file direct testimony until February 7, 2022. In this instance, intervenors were required to decide whether to intervene at least sixty-six days prior to the date on which Dominion would file testimony. Potential intervenors should have an opportunity to review the utility's direct testimony before deciding to intervene. Additionally, in most other types of proceedings before the Commission, the utility files an application prior to the intervention deadline.

The change proposed by CMC would not prejudice any party. The utility's case should not change based on the number or identity of the parties that have intervened, the utility knows many elements of its case months before filing direct testimony, and any party that wishes to intervene sooner has the right to do so. Moving the intervention deadline such that it occurs later than the filing of the utility's direct testimony will allow parties to review and assess the Company's filing before deciding whether to intervene – this is typical in other proceedings.

In short, CMC asks that the intervention deadline in annual fuel proceedings be set for a date subsequent to that on which the utility files its direct testimony. Thank you for the opportunity to express our views on this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Alex Shissias", is written over a horizontal line.

Alexander G. Shissias

S.C. Bar # 11610

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